

Applicant: Petter Honkalampi et al.  
Application No.: 10/535,431  
Response to Office action mailed Apr. 25, 2008  
Response filed July 17, 2008

### Remarks

Claims 19–47 remain pending in the application. In the Office action dated Apr. 25, 2008, claims 19–47 were rejected as being anticipated by Laapotti (FI 109481, WO 02/092908) and claims 19–47 were rejected as obvious over Pajula et al. (EP 0487483) in view of Ilmarinen (US 6,197,156), or Laapotti.

Claim 19 has been amended to require two first fabric loops which pass through the first nip, as are also claimed in claims 36 and 43. Claim 36 has been amended to delete a duplicate “and”. Claim 42 has been amended for greater clarity.

Claims 19–47 are not anticipated by Laapotti because the claims require three press nips in a pressing section, Laapotti shows a pre-press nip in the forming section, followed by two nips in a pressing section.

**Ilmarinen** differs from the claimed invention by:

1. Not showing a closed draw through the press section
2. Not showing a “straight run through the press section”
3. Not showing “a first press nip arranged to dewater a web on a first side and a second side” “having at least two first fabric loops which pass through the first press nip” wherein the “at least two first fabric loops do not pass through the second press nip or the third press nip”

**Pajula et al.**, as stated by the examiner, “fail [*sic*] to teach the opposite dewatering direction of the last two nips.” Moreover, Pajula et al. affirmatively shows that the last press nip of FIG. 5 dewateres in two directions – “the third, sharp [not long] press nip N3, which is formed between hollow-faced [not smooth] 65' and 75' press rolls 65, 75.” (Col. 9, lines 25–27.) Moreover, the embodiment of FIG. 5 is described as directed to very high paper-machine speeds, and thus modifications to the forming section of FIG. 5, which would decrease its dewatering capability, would be contrary to the teaching of Pajula et al. because reducing the dewatering from two sides to one side is inconsistent with the disclosed purpose of the forming section of FIG. 5, i.e, high speed web information.

**Laapotti** does not show three nips in the pressing section, but only two pressing

Applicant: Petter Honkalampi et al.  
Application No.: 10/535,431  
Response to Office action mailed Apr. 25, 2008  
Response filed July 17, 2008

section nips, and one pre-press nip (NO) in the forming section. This pre-press nip (NO) does not correspond to the claimed “*a first press nip arranged to dewater a web on a first side and a second side*”.

Laapotti states in the paragraph bridging pages 2 and 3 “*Attempts have been made to remedy the problem, for example, such that to a press provided with a centre roll a separate inverted press nip is added after the centre roll, in which press nip the dewatering direction is opposite to the dewatering direction of the last press nip of the centre roll.*” In Laapotti there is no expectation that what has been attempted in the past will prove successful, because although the disclosure of Laapotti teaches in accordance with the examiner’s assessment that “*second and third nips are arranged so that the water receiving fabrics are arranged on opposite sides*”, Laapotti goes on to describe a solution to the problem of uneven absorption of printing ink “*after the press section (300), heating is applied by at least one hot pre calendering device (Nh) to that surface of the web which is placed against a substantially water-impervious press surface in the last press nip (N1, N2) of the press section*” (page 19, lines 20–23), rather than the previously inadequate solution of a “*press nip the dewatering direction is opposite to the dewatering direction of the last press nip of the centre roll*”(page 3, lines 9-10).

So Laapotti does not teach a press section arranged as claimed, and teaches away from the suggestion that dewatering on opposite sides with the last two nips is by itself a successful solution to the problem of asymmetry of the absorption properties of the web.

#### **Argument**

Pajula et al. does not identify a need to improve the symmetry of the web formed with the arrangement shown in FIG. 5, so the motivation or suggestion to combine must be provided by Ilmarinen or Laapotti. Further as explained above, Pajula et al. in the embodiment of FIG. 5 is specially arranged for high-speed, such that reducing the dewatering capability of the pressing section of FIG. 5, i.e., going from two-sided to one-sided dewatering, is contrary to the rationale behind the arrangement of FIG. 5 so that a person of ordinary skill starting with Pajula et al. would not have any motivation to look for the

Applicant: Petter Honkalampi et al.  
Application No.: 10/535,431  
Response to Office action mailed Apr. 25, 2008  
Response filed July 17, 2008

solution presented by Ilmarinen or Laapotti.

So if a case for obviousness is to be made it must start from Ilmarinen or Laapotti, and from this perspective provide a motivation for modification of one of these references in view of Pajula et al.

However, as pointed out above, Ilmarinen or Laapotti differ substantially from the claimed invention in many aspects, and while both references may provide some disclosure of a technique of first dewatering from one side and then from the other, neither of the references provide anything which can be rationally articulated as providing a motivation for selecting and combining the disclosure of Pajula et al. to produce applicant's claimed invention.

In other words, the logical error in the examiner's rejection is that the suggestion or motivation from Ilmarinen or Laapotti is taken out of the context of those references and transplanted into Pajula et al. in a self-referential way so as to call attention to the source from which the suggestion was taken. But the suggestion(s) of Ilmarinen or Laapotti must be taken in context, and in their proper context there is nothing in them that looks to Pajula et al. The only way the references can be combined is by using applicant's claimed invention as a blueprint to pick and choose similar structures from the prior art.

This logical error is present also in the IPER where the PCT examiner discovers a problem which Ilmarinen or Laapotti seeks to solve, and transposes that problem into Pajula et al. and then finds the solution to the now implanted problem of Pajula et al. in Ilmarinen or Laapotti.

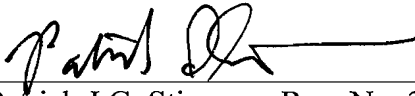
The dependent claims serve to further distinguish the independent claims which distinguish over the art of record.

Applicant believes that no new matter has been added by this amendment.

Applicant: Petter Honkalampi et al.  
Application No.: 10/535,431  
Response to Office action mailed Apr. 25, 2008  
Response filed July 17, 2008

Applicant submits that the claims, as amended, are in condition for allowance.  
Favorable action thereon is respectfully solicited.

Respectfully submitted,



---

Patrick J.G. Stiennon, Reg. No. 34934  
Attorney for Applicant  
Stiennon & Stiennon  
P.O. Box 1667  
Madison, Wisconsin 53701-1667  
(608) 250-4870  
Amdt2.res

July 17, 2008 (10:48am)